

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE  
TO APWU INTERROGATORY APWU/USPS-T1-9  
(February 23, 2006)

The United States Postal Service hereby submits its objections to the following interrogatory of American Postal Workers Union, AFL-CIO, filed on February 17, 2006: APWU/USPS-T1-9.

In its February 22, 2006, response to DBP/USPS-14, the Postal Service provided a list of hundreds of mail processing plants. In anticipation of that response, APWU/USPS-T1-9 requested that the Postal Service provide information pertaining to each facility regarding:

- (a) its size;
- (b) the number of floors on which mail processing operations occur;
- (c) the type of mail currently processed at each facility;
- (d) the type and number of mail processing equipment in use at each facility;
- (e) the mail processing complement by craft; and
- (f) the monthly average volume of mail processed by type for the most recent 12-month period.

The Postal Service objects on several grounds.

The interrogatory reveals either a basic misunderstanding of the purpose and scope of this docket or a desire to unduly burden the discovery process in this case in

pursuit of data related to APWU's role as a collective bargaining representative for certain postal employees.

The purpose of this docket is not, as this interrogatory appears to assume, for the Postal Rate Commission to conduct facility-by-facility analysis and to offer facility-by-facility judgments about potential outcomes in the execution of the Postal Service's Evolutionary Network Development strategy. The request in this proceeding seeks an advisory opinion from the Commission regarding whether, in principle, changes in service pursuant to the objectives of Evolutionary Network Development, if implemented on at least a substantially nationwide basis, would conform to the policies of the Postal Reorganization Act.

The Postal Service concedes that an understanding of process by which it intends to realign its network and to implement service changes is fundamental to the Commission's role under § 3661. Accordingly, the Postal Service has provided information in support of its request which explains the network realignment analysis and decision-making process, and how decisions to change service for specific 3-digit ZIP Code origin-destination pairs can result. Moreover, there are specific examples in USPS Library Reference N2006-1/5 of how the process has been executed and is expected to be carried out as the Postal Service moves forward.

It seems that the only apparent purpose for which one might request the data described in APWU/USPS-T1-9 would be for the purpose of debating or challenging potential AMP review outcomes on a facility-by-facility basis. However, such an exercise would be unrelated to the Commission's responsibilities under § 3661. The Postal Service cannot conceive of a purpose for which the Commission, in discharging

its responsibilities under § 3661, would need facility-specific square footage measurements. Nor does there appear to be a need for the parties to know which mail processing plants operate on more than one floor. It also does not appear necessary for the parties or Commission to know which of the scores of mail processing operations are currently performed at each particular facility. Nor is there an apparent need for the record in this proceeding to reflect the number of each type of mail processing equipment deployed at each of the hundreds of mail processing plants listed in response to DBP/USPS-14. Likewise, a breakdown of the current number of clerks or mailhandlers at any particular facility would seem to have no material bearing on the Commission's advisory role under § 3661. The same would seem the case regarding the volume of mail by class processed at each of the plants listed in response to DBP/USPS-14. However pertinent any of this information may be to the decisions that postal management will make in the years ahead on a facility-by-facility basis as part of the AMP review process, such information has no material bearing on the Commission's role under § 3661.

In addition, the Postal Service considers the requested mail class-specific volume information to be privileged because of its commercially sensitive and proprietary nature. Such information, if publicly disclosed, could be used by competitors involved in the business of transmitting and delivering otherwise mailable matter, to gain an unfair competitive advantage, to the economic detriment of the Postal Service *and its employees*.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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